



**ANCHOR**  
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May 22, 2002  
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DEPT OF ENVIRONMENTAL QUALITY  
NORTHWEST REGION

Rodney G. Struck, R.G.  
Oregon Department of Environmental Quality  
2020 SW 4th Avenue, Suite 400  
Portland, Oregon 97201-5263

Re: Pre-RI Assessment Work Plan, Brix Maritime Site, Portland, Oregon

Dear Rod:

Anchor Environmental L.L.C. (Anchor Environmental) has prepared this Pre-Remedial Investigation Assessment Work Plan (Work Plan) to guide investigation activities at the Brix Maritime Company (Brix) site in Portland, Oregon. Brix has elected to conduct this Work Plan to determine if a Remedial Investigation (RI) is necessary at the site.

The Work Plan requirements are described in section III of Attachment B to the May 8, 2002 Voluntary Agreement for Remedial Investigation and Source Control Measures (Agreement) between the Oregon Department of Environmental Quality (DEQ) and Brix. The agreement states that the Work Plan shall describe the following:

- Objectives
- Deliverables
- Schedule
- Specific tasks

## OBJECTIVES

The objectives of this Pre-RI Assessment are to determine which media and pathways may be affected by site-related hazardous substances and to determine whether further action is needed to assure protection of present and future public health, safety and welfare, or the environment.

Section III of Attachment B to the Agreement also states that no further work shall be required under this Agreement and SOW if, based on historical information and the results of the Pre-RI Assessment or subsequent facility investigation, DEQ reasonably determines that there is no likely present source and pathway for the release of hazardous substances to surface water or sediments at or from Respondent's facility for which DEQ could require a removal action or remedial investigation under ORS 465.200 *et seq.*

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## **WORK PLAN TASKS**

You and I discussed the Work Plan requirements in a teleconference on May 15, 2002. You said that the review of facility operations and history that is normally required in a Pre-RI Assessment is not needed for this site because the historical information provided to DEQ by Brix in previously submitted documents is satisfactory.

This Work Plan proposes to conduct a groundwater investigation as described in the March 18, 2002 Work Plan for Groundwater Investigation prepared by Hahn and Associates (HAI) for Brix. You indicated in our May 15, 2002 teleconference that the March 18, 2002 Work Plan is satisfactory to DEQ.

The HAI Work Plan includes the installation of four monitoring wells to establish groundwater flow direction and gradient, evaluate seasonal trends in groundwater and surface water elevations, evaluate seasonal trends in groundwater quality, and evaluate the groundwater to surface water pathway. Under this Work Plan, Anchor Environmental will obtain groundwater samples from the wells at least twice, during seasonal high and low water table periods. The groundwater quality data will be compared with DEQ's water quality source control screening criteria when the criteria are finalized. If the concentrations exceed the screening criteria, Brix will propose additional assessment for consideration by DEQ. If the groundwater data pass the screening criteria, the groundwater pathway will not require further investigation under the Agreement.

You also indicated in our teleconference that an evaluation of stormwater as a potential pathway to the river should be addressed in the Work Plan. Stormwater from the employee parking areas is collected and routed to the embankment via two storm water pipes. In addition, two City of Portland stormwater outfalls pass through the property. One of the outfalls was plugged and abandoned in place in 1999 and the other discharges through the property, to the Willamette River. Potential impacts associated with these outfalls are not included in this assessment. Anchor Environmental will evaluate the design and operation of the Brix stormwater collection system to determine if further evaluation of the system is warranted. The findings of the stormwater system evaluation will be provided to DEQ in a technical memorandum accompanying the results of the first round of groundwater sampling from the proposed monitoring wells.

## **DELIVERABLES**


Preliminary sampling results and other data generated from the Pre-RI Assessment will be presented in quarterly progress reports. Following completion of the Pre-RI Assessment, a report will be prepared covering the findings of the investigation, including figures and tables presenting the results of the sampling and analysis. The report will present conclusions regarding the likelihood of past or present source(s) and pathway(s) for the release of hazardous substances to sediments adjacent to the Brix facility. The report will include a

determination of the need for a Remedial Investigation and whether a re-evaluation of the priority of the Brix facility is appropriate.

## **SCHEDULE**

Within 30 days of approval of this Work Plan, monitoring wells will be installed at the Brix facility. The monitoring wells will be developed and sampled within one to two weeks of installation. An additional sampling event will occur during low water (September/October 2002). A Pre-RI Assessment report will be submitted to the DEQ within 30 days of receiving the laboratory analytical results for the low water sampling round.

Sincerely,



John E. Edwards, R.G., C.E.G.  
Anchor Environmental, L.L.C.

Cc: Kim Johannessen, Johannessen & Associates, P.S.  
David Templeton, Anchor Environmental, L.L.C.